

Honorable Lauren J. King

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
TACOMA DIVISION

MONET CARTER-MIXON, as Personal  
Representative of the Estate of MANUEL  
ELLIS, and MARCIA CARTER,

Plaintiffs,

v.

CITY OF TACOMA, CHRISTOPHER  
BURBANK, MATTHEW COLLINS,  
MASYIH FORD, TIMOTHY RANKINE,  
ARMANDO FARINAS, RON  
KOMAROVSKY, PIERCE COUNTY,  
GARY SANDERS, and ANTHONY  
MESSINEO,

Defendants.

Case No.: 21-CV-05692 LJK

**DEFENDANT COLLINS INITIAL  
DISCLOSURE PURSUANT TO  
FRCP 26(a)(1)**

Pursuant to Federal Rule of Civil Procedure 26(a)(1), defendant Collins

submits the following pretrial initial disclosures:

**A. Name and, if known, the address and telephone number of each individual likely to have discoverable information - along with the subjects of that information - that the disclosing party may use to support its claims or defenses, unless solely for impeachment.**

**DEFENDANT COLLINS INITIAL DISCLOSURE  
PURSUANT TO FRCP 26(A)(1) - 1**



1 Henry Betts  
2 Anna Brahs  
3 Christopher Burbank  
4 Herbert Chung  
5 Matthew Collins  
6 Daniel Derr  
7 Armando Farinas  
8 Masyih Ford  
9 Andy Guiardinu  
10 Barton Hayes  
11 Martese Hightower  
12 Chris Karl  
13 Ron Komarovsky  
14 Michael Lim  
15 Katherine Madden  
16 Lt. Miller  
17 Jennifer Mueller  
18 Timothy Rankine  
19 Gary Roberts  
20 Gregory Rock  
21 Ed Troyer  
22 Ryan Warner  
23 Wesley Schneider  
24 Unknown Individuals  
25 Tacoma Police Department  
26 3701 S Pine St  
27 Tacoma, WA 98409  
28 253-798-4721

Byron Brockway  
Thomas Catey  
Patrick Dos Remedios  
Richard Folden  
Amandia Gregory  
Franz Helmcke  
Jesse Hotz  
Deputy Laiuppa  
Robert Langlow  
James Loeffelholz  
Steven Mell  
Anthony Messineo  
Det. Minion  
Alexa Moss  
Gary Sanders

**DEFENDANT COLLINS INITIAL DISCLOSURE  
PURSUANT TO FRCP 26(A)(1) - 2**



**PUGET LAW GROUP**  
708 BROADWAY SUITE 400  
TACOMA WA 98402  
TEL 253 627 4696  
FAX 253 617 1013

1 Steven Wilkins  
2 Jason Youngman  
3 Unknown Individuals  
4 Pierce County Sheriff's Department  
5 County-City Building, First Floor  
6 930 Tacoma Ave. S.  
7 Tacoma, WA 98402  
8 253-798-7530

9 Anthony Bucat  
10 Unknown Individuals  
11 Lakewood Police Department  
12 9401 Lakewood Dr S  
13 Lakewood, WA 98499  
14 253-830-5000

15 Fiona Couper  
16 Trooper K. Jones  
17 Asa Louis  
18 Michael Marken  
19 Daniel Richmond  
20 Jeffrey Rhue  
21 Robert Schroeder  
22 Dawn Sklerov  
23 Unknown Individuals  
24 Washington State Patrol  
25 106 11th Ave. SW  
26 Olympia, WA 98501  
27 360-596-4000

28 John Brakebush  
Ronald Herrera  
Tad Jackson  
Jeffrey Polo  
Chris Rady  
Marlon Ridgeway  
Kelly Sumner  
Nicholas Wilson  
Unknown Individuals  
Tacoma Fire Department  
901 Fawcett Avenue  
Tacoma, WA 98402  
253-591-5737

DEFENDANT COLLINS INITIAL DISCLOSURE  
PURSUANT TO FRCP 26(A)(1) - 3



**PUGET LAW GROUP**  
708 BROADWAY SUITE 400  
TACOMA WA 98402  
TEL 253 627 4696  
FAX 253 617 1013

Jacob Atzet  
Thomas Clark, III  
Karen Cline  
Jan Schaler  
Unknown Individuals  
Pierce County Medical Examiner  
3619 Pacific Ave  
Tacoma, WA 98418  
253-798-6494

Keith Barnes  
Unknown Individuals  
Pierce County Prosecuting Attorney's Office  
930 Tacoma Ave S, #946  
Tacoma, WA 98402  
253-798-7400

Unknown Individuals  
Office of the Attorney General  
1125 Washington St SE  
PO Box 40100  
Olympia, WA 98504-0100  
360-753-6200

Cedric Armstrong  
Kenneth Ashford-White  
Seth Cowden  
Matthew Ellis  
Mendel Everson  
Shad W. Hayes  
Kimberly M. Lux  
Keyon Lowery  
Kimberly Mayes  
Sara McDowell  
Ed Patterson  
Aiyana White  
Jeremy J. White  
Contact Info Unknown

Monte Carter-Mixon  
Marcia Carter  
c/o James Bible  
James Bible Law Group  
14205 SE 36th Street, Ste 100

**DEFENDANT COLLINS INITIAL DISCLOSURE  
PURSUANT TO FRCP 26(A)(1) - 4**



Bellevue, WA 98006  
425-519-3675

**B. A copy - or a description by category and location - of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody or control and may use to support its claims or defenses, unless the use would be solely for impeachment.**

1. 911 calls and CAD
2. TPD reports and investigation
3. PCSD reports and investigation
4. Lakewood PD reports and investigation
5. Washington State Patrol reports and investigation
6. Tacoma Fire Departments medical records and reports
7. Pierce County Medical Examiner reports and investigation
8. Pierce County Prosecuting Attorney's Office reports and investigation
9. Office of the Attorney General reports and investigation
10. Any and all photos and video of the incident and scene
11. News report interviews
12. Taped interviews

**C. A computation of each category of damages claimed by the disclosing party - who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.**

Special damages:

N/A

General damages:

N/A

Punitive damages:

N/A

**D. For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

DEFENDANT COLLINS INITIAL DISCLOSURE  
PURSUANT TO FRCP 26(A)(1) - 5



1 N/A

2 Defendant Collins notes that investigation into this matter is ongoing.

3  
4 Defendant Collins reserves the right to supplement this disclosure with additional individuals  
5 and/or additional subjects of information and additional damages as may be required by  
6 further developments.

7 DATED THIS 21st day of January, 2022.

8  
9 PUGET LAW GROUP, LLP  
10 Attorneys for Defendant Collins

11  
12 By: 

13 Casey M. Arbenz, WSBA #40581  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

28 DEFENDANT COLLINS INITIAL DISCLOSURE  
PURSUANT TO FRCP 26(A)(1) - 6



**PUGET LAW GROUP**  
708 BROADWAY SUITE 400  
TACOMA WA 98402  
TEL 253 627 4696  
FAX 253 617 1013

CERTIFICATE OF SERVICE

I, Karla Bonilla, hereby certifies under penalty of perjury under the laws of the State of Washington, that on the day set forth below, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorneys of record for the plaintiffs and co-defendants and hereby certify that I have mailed the document by email to defendant Collins.

Signed at Tacoma, Washington this 21st day of January, 2022.

Karla Bonilla

Karla Bonilla  
Paralegal  
708 Broadway, Ste. 400  
Tacoma, WA. 98402  
T: 425-243-7007  
F: 253-617-1013  
karla@pugetlawgroup.com

DEFENDANT COLLINS INITIAL DISCLOSURE  
PURSUANT TO FRCP 26(A)(1) - 7



**PUGET LAW GROUP**  
708 BROADWAY SUITE 400  
TACOMA WA 98402  
TEL 253 627 4696  
FAX 253 617 1013